С	ase 2:22-cv-00047-RFB-BNW	Document 20	Filed 11/0	6/24	Page 1 of 4				
1	R. DUANE FRIZELL, ESQ. Nevada Bar No. 9807								
2	FRIZELL LAW FIRM, PLLC								
3	400 N. Stephanie St., Suite 265 Henderson, Nevada 89014								
4	Office (702) 657-6000 Facsimile (702) 657-0065								
5	<u>DFrizell@FrizellLaw.com</u>								
6	Attorney for Plaintiff Las Vegas Skydiving Adventures	LLC							
7									
8	UNITED STATES DISTRICT COURT								
9	DISTRICT OF NEVADA								
10	LAS VEGAS SKYDIVING AD	VENTURES	8						
11	LLC, a Nevada limited-liability	company,	\$ \$ \$ \$ Case N						
12	Plaintiffs,			o.: 2:22	2-cv-00047-RFB-BNV	V			
13	VS.		§ § §						
14	GROUPON, INC., a Delaware DOES I through X, inclusive; a		§ 8						
15	CORPORATION I,	nu ROL	§ §						
16	Defendants.		\$ \$ \$ \$						
			_ §						
17	STIPULATION AND	ORDER FOR D	ISMISSAL	WITH	PREJUDICE				
18	Pursuant to FRCP 41(a)(1	)(A)(ii), Plaintiff	LAS VEGAS	S SKYI	DIVING ADVENTUR	RES			
19 20	LLC ("Plaintiff") and Defendant GROUPON, INC. ("Defendant") now tender to the Court this								
21	Stipulation and Order for Dismissal with Prejudice (the "SAO"). In connection with this SAO,								
22	Plaintiff and Defendant (each a "Party" and collectively the "Parties") hereby STIPULATE and								
23	AGREE as follows:								
24		STIPULAT	<u> TION</u>						
25	1. In the bankruptcy	case captioned In 1	re Las Vegas	Skydivi	ing Adventures, LLC, C	Case			
26	No. 22-13307, pending in the United States Bankruptcy Court for the District of Nevada (the								
	"Bankruptcy Proceeding"), the Parties reached a global settlement agreement (the "Agreement")								
27	that fully resolves this matter.	C		_	-	ĺ			
28	-								

1	2. Pursuant to the terms of the Agreement, this action shall be dismissed in its entire					
2	with prejudice.					
3	3. Each Party shall bear its own attorney fees and court costs.					
4	IT IS SO STIPULATED.					
5	DATED: <i>November 5, 2024</i> .		FRIZELL LAW FIRM, PLLC			
6			400 N. Stephanie St., Suite 265 Henderson, Nevada 89014			
7			Telephone: (702) 657-6000			
8						
9		By:	/s/ R. Duane Frizell R. DUANE FRIZELL, ESQ.			
10			Nevada Bar No. 9807			
11			Attorney for Plaintiff			
12	DATED: <i>November 5, 2024</i> .		GREENBERG TRAURIG, LLP 10845 Griffith Peak Dr, Suite 600			
13			Las Vegas, Nevada 89135			
14						
15		By:	<u>/s/ Tyler Andrews</u> MARK E. FERRARIO, ESQ.			
16			Nevada Bar No. 1625			
17			<b>TYLER ANDREWS, ESQ.</b> Nevada Bar No. 9499			
18			Attorneys for Defendant			
19						
20						
21						
22						
23						
24						
25						
$\begin{bmatrix} 23 \\ 26 \end{bmatrix}$						
27						
28						
40						

**ORDER** 1 2 Having reviewed the foregoing Stipulation of the Parties, and finding good, just, and 3 sufficient cause therefor, it is hereby entered as an ORDER of this Court. 4 IT IS FURTHER ORDERED as follows: 5 This action is hereby DISMISSED in its entirety WITH PREJUDICE. A. 6 B. Each Party shall bear its own attorney fees and court costs. 7 IT IS SO ORDERED. 8 DATED: November 6, 2024. 9 10 11 12 RICHARD F. BOULWARE, II 13 UNITED STATES DISTRICT JUDGE 14 Submitted by: 15 FRIZELL LAW FIRM, PLLC 16 <u>/s/ R. Duane Frizell</u> 17 By: R. DUANE FRIZELL, ESQ. 18 Nevada Bar No. 9807 Attorney for Plaintiff 19 20 21 22 23 24 25 26 27 28

## **CERTIFICATE OF SERVICE** 1 2 I HEREBY CERTIFY that service of the foregoing STIPULATION AND ORDER FOR 3 **DISMISSAL WITH PREJUDICE** was made on November 5, 2024, upon the following parties: 4 MARK E. FERRARIO, ESQ. Nevada Bar No. 1625 5 TYLER ANDREWS, ESQ. Nevada Bar No. 9499 6 GREENBERG TRAURIG, LLP 7 10845 Griffith Peak Dr, Suite 600 Las Vegas, Nevada 89135 8 Attorneys for Defendant 9 BY ELECTRONIC SERVICE: I served a true copy, together with any and all exhibits, electronically on designated recipients via electronic transmission of said document(s) as provided 10 under the Federal Rules of Civil Procedure. 11 12 /s/ Aiain Niu 13 AIQIN NIU an Employee of 14 FRIZELL LAW FIRM, PLLC 15 16 17 18 19 20 21 22 23 24 25 26

27

28